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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

NOV 1 5 1993

DATE:

SUBJECT: Paving of Alleys and Driveways at the NL Industries

Site in Granite City, Illinois

FROM: Brad Bradley BB

Remedial Project Manager

TO: NL Industries File

Alleys and driveways in Venice, Eagle Park Acres, Granite City, and Madison, Illinois and other surrounding communities will not be paved at all locations where remediation of crushed hard rubber battery case material (battery case material) from the NL Industries/Taracorp Site in Granite City, Illinois (the NL Site) is undertaken. Instead, at locations where the 500 parts per million (ppm) lead cleanup level can be achieved within four feet of the alley or driveway surface, crushed rock will be used for surface restoration.

On page 18 of the Record of Decision (ROD) for the NL Site, it states "...battery case material shall be excavated from all alleys and driveways in Venice, Eagle Park Acres, and other nearby communities in which it has come to be located at or near the surface....Excavated areas shall be backfilled, if necessary, and paved."

This change to the ROD is not significant and is a logical outgrowth of the ROD. Experience with remediating four alleys and five driveways in Venice, Eagle Park Acres, and Granite City, Illinois has indicated that a 500 ppm cleanup level can be achieved within approximately 18 inches of the surface and within several inches of the bottom of the visual battery case material. The additional expense of disposing of the soil which contains greater than 500 ppm lead but does not contain the visual battery case material is outweighed by the cost savings from placing crushed rock on the restored surface versus concrete, and the fact that no future Operation and Maintenance will be required at these alleys and driveways since "clean closure" will be achieved, i.e. no soil with lead concentrations in excess of the 500 ppm cleanup level will be left in place.